

From: [Sontag, John](#)
To: [Park, Andy](#); [Ferreira, Steve](#); ["Anthony Findley"](#); [Mark D. Fisher \(mfisher@elminc.com\)](#); [Ansari, Ramin](#); [Kirby, Lisa](#); [Ostapczuk, Eric](#); [Michael DiNinno](#); [Venkat Puranapanda \(Venkat.puranapanda@chubb.com\)](#)
Cc: [Peachey, Bryan](#); [Devorak, Coleen](#); [Schindler, Jason](#); [Soukup, James](#); [Sontag, John](#)
Subject: Hatco Quarterly Progress Report 63
Date: Friday, July 02, 2021 3:12:37 PM
Attachments: [ATT00001.txt](#)
[2021-06-30 Weston EPA-Progress Rpt 63.pdf](#)

All,

Attached please find a copy of the Quarterly Progress Report for remediation activities at the Hatco site. Feel free to contact me if you have any questions.

Thank you,

John

John Sontag, Jr. PE
Client Account Manager



WESTON SOLUTIONS, INC.
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610-701-3679 – Direct
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WESTON SOLUTIONS, INC.
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June 30, 2021

Mr. Andy Park, Acting Chief
Corrective Action Section
Hazardous Waste Programs Branch
U.S. EPA Region 2
290 Broadway, 25th Floor
New York, New York 10007-1866


Mr. John M. Mitch, Clerk
Woodbridge Township
1 Main Street
Woodbridge, NJ 07095

Re: Hatco Site
Fords, NJ
Program Interest Number G000003943

Dear Mr. Park and Mr. Mitch:

Weston Solutions, Inc. (Weston) is forwarding Progress Report Number 63, which covers the activities associated with the Hatco Site from March 1 through May 31, 2021. The progress report is being submitted in accordance with the requirements of Weston's May 25, 2005 Administrative Consent Order and March 30, 2005 USEPA approval letter. If you have any questions, please do not hesitate to contact me at (610) 701-3679.

Very truly yours,
WESTON SOLUTIONS, INC.


John Sontag, Jr.
Client Account Manager

cc: S. Ferreira, (USEPA)
A. Findley (NJDEP)
M. Fisher – LSRP (ELM)
R. Ansari, L. Kirby, E. Ostapczuk (Hatco/LANXESS)
M. DiNinno (MCUA)
V. Puranapanda (CHUBB)



ADMINISTRATIVE CONSENT ORDER PROGRESS REPORT

1. Progress Report Number: 63
2. Site Location: Hatco Site
1020 King Georges Post Road
Fords, NJ 08863
3. Signatories: Weston Solutions, Inc.
ACE American Insurance Company
New Jersey Department of Environmental Protection
4. Reporting Period: March 1 through May 31, 2021
5. Specific Requirements Initiated and Completed During Reporting Period:
 - 5.1 Weston submitted Progress Report Number 62 on March 31, 2021.
 - 5.2 Weston provided monthly progress updates by email to the United States Environmental Protection Agency (USEPA) on April 6, May 12, and June 8, 2021.
6. Specific Requirements Previously Initiated Which are Continuing:
 - 6.1 Weston continued light non-aqueous phase liquid (LNAPL) recovery operations. Weston conducted recovery operations at the site using automated skimmer pumps and manual bailers. Total recovery through the end of this reporting period:
 - 10,798 gallons of LNAPL recovered using skimmer pumps and bailers since March 2011;
 - 3,200 gallons recovered and shipped offsite in liquid phase during the Southeast Leg remediation; and
 - 25,000 gallons estimated in LNAPL-saturated soils shipped for offsite disposal during the Southeast Leg remediation. The quantity was estimated as follows: 1,261 tons of LNAPL-saturated soil was shipped offsite for disposal during the Southeast Leg remediation project. Based on field observations Weston made the following assumptions regarding the quantity of LNAPL contained within the pore volume of that soil: The average soil density was 1.6 tons per cubic yard and the estimated soil porosity was 35%. This resulted in slightly more than 50,000 gallons of pore space. That volume was halved to estimate a conservative volume of approximately 25,000 gallons of LNAPL trapped within that pore space.
 - 6.2 Monthly progress meetings with the Licensed Site Remediation Professional (LSRP).
 - 6.3 In July 2020, Weston submitted an Ecological Risk Assessment (ERA) Work Plan to NJDEP and EPA, which focused on developing a cleanup goal for BEHP in soil and sediment for the northern portion of the Channel D/AOC-25 wetland. NJDEP and EPA provided comments on the Work Plan to Weston on November 13, 2020. Weston's LSRP replied to USEPA and NJDEP by email dated December 7, 2020, requesting a meeting to discuss the comments. A conference call was held on

- February 25, 2021 with NJDEP and USEPA to discuss the comments on the Work Plan . A follow-up meeting is planned with the regulators in July to further discuss next steps in AOC 25 following additional assessment of the existing data.
- 6.4 Resampling in the northern portion of Channel D/AOC 25 sediments was completed in December 2020. Those data will be discussed with EPA and NJDEP during the July meeting. Additional sampling, if required, would be performed in the summer of 2021. The GP12 application for deeper sampling was approved by NJDEP on January 13, 2021.
 - 6.5 Weston is working to complete the site-wide cap design and to finalize plans for the field sampling program that is needed to determine the final cap extent. Weston is currently preparing a preliminary work plan to clarify the capping approach.
 - 6.6 An emergency permit modification to address additional streambank erosion in Slingtail Creek was granted by NJDEP on October 23, 2019. The permit modification was submitted to NJDEP on June 9, 2020. NJDEP issued the permit on December 2, 2020. Weston received approval of the mitigation plans from NJDEP on March 21, 2021. The initial mitigation activities were performed May 24 through 26, 2021. The remainder of the work will be completed in the fall of 2021 to accommodate appropriate planting schedules.
 - 6.7 Weston has completed the remediation of Hatco-related contaminants identified in Woodbridge Pond sediments (Hatco AOC 24) and wetland restoration. The first annual wetland monitoring report was submitted on December 29, 2020. The Remedial Action Report and AOC-specific Response Action Outcome for AOC 24 were submitted on January 21, 2021.
 - 6.8 Weston has prepared a Quality Assurance Project Plan addendum and permit modification necessary to remove an isolated area of PCB-contamination identified in the wetland portion of the Crown Relocators property (part of Hatco AOC 23). The permit application is currently being revised to address NJDEP comments. Remediation will be scheduled following NJDEP approval of the permit application.
 - 6.9 Water was observed seeping out of the ground at the decommissioned seep interceptor vault system in early 2019. Iron staining was noted on the surface of the surrounding pavement. No evidence of LNAPL or PCB exceedances were detected in the samples of water from the vault in June 2019 and February 2020. During this quarterly reporting period, Weston pumped out the vault on May 7, 2021 to prevent further seepage. Weston is working on plans to remove the structures associated with the vault.
 - 6.10 Weston is continuing preparation of the remedial action progress reports for the completed Southeast Leg, Northeast Impoundment and Former Lagoon Cap remediation projects.
 - 6.11 The revised Remedial Action Progress report for the Southeast Leg Pond Area Phase 1 Sample Results and Recommendations was finalized and distributed on April 27, 2021. Phase 2 sampling was performed May 10 through May 18, 2021. Weston is evaluating the data.
 - 6.12 Weston distributed the biennial Public Notification on March 29, 2021.
7. Specific Requirements Scheduled for Completion, but not Completed During the Reporting Period:
- 7.1 Update scope and schedule for Channel D remediation.



- 7.2 Confer with USEPA to review preliminary engineering plans for site-wide capping of remaining contaminated soil.
- 8. Explanation for Each Item of Non-Completion in Item 7:
 - 8.1 Weston is currently in discussions with the property owners for Channel D and will update the scope and schedule based on those discussions.
 - 8.2 Weston is currently preparing a preliminary work plan to clarify the capping approach. Weston will schedule a conference with USEPA when the work plan is ready.
- 9. Specific Requirements to be Initiated in Next Reporting Period (June - August 2021):
 - 9.1 Continue preparation of Southeast Leg, Northeast Impoundment, and Former Lagoon Cap Remedial Action Progress Reports.
 - 9.2 Confer with USEPA to review preliminary engineering plans for site-wide capping of remaining contaminated soil.
 - 9.3 Preparations for remediation of contamination on Crown Relocations Property (AOC 23), pending permit approval.